

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Inventors : Rene Bitsch	Appeal No.
Appln. No.: 10/674,834	
Filed : September 30, 2003	Group Art Unit: 2162
For : LABEL SYSTEM-TRANSLATION OF TEXT AND MULTI-LANGUAGE SUPPORT AT RUNTIME AND DESIGN	Examiner: Anh Ly
Docket No.: M61.12-0531	

REPLY BRIEF

Mail Stop Appeal Brief-Patents Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450	Electronically Filed on October 29, 2008
--	---

Sir:

This is a Reply to the Examiner's Answer dated September 3, 2008.

Contents

Real Party in Interest	3
Related Appeals and Interferences	4
Status of The Claims	5
Status of Amendments	6
Summary of Claimed Subject Matter	7
1. Introduction	7
2. Brief Background	7
3. The Present Invention	9
Grounds of Rejection to Be Reviewed On Appeal	10
Argument	11
1. Introduction: Claims 1, 4-13, 15-19 and 41 Should Be Allowed	11
2. Anticipation	11
3. Obviousness	11
4. Claims 1, 4, 9-10 and 41 are patentable, as they are not anticipated by the prior art	12
5. Claims 5-8, 11-13 and 15-19 are patentable, as they are not obvious in view of the prior art	14
6. Conclusion	17
Appendix: Claims on Appeal	19
Evidence Appendix	27
Related Proceedings Appendix	28

REAL PARTY IN INTEREST

Microsoft, a corporation organized under the laws of the state of Washington, and having offices at One Microsoft Way, Redmond, WA 98052, has acquired the entire right, title and interest in and to the invention, the application, and any and all patents to be obtained therefor, as set forth in the Assignment filed with the patent application and recorded on Reel 014565, frame 0186.

RELATED APPEALS AND INTERFERENCES

There are no known related appeals or interferences which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

STATUS OF CLAIMS

Claims 1-40 were originally presented. In an amendment filed September 4, 2007 and refiled October 2, 2007, claims 2, 3, 14 and 20 were canceled; claims 21-40 were withdrawn from consideration; claims 1, 4-13 and 15-19 were amended; and new claim 41 was added. In an Amendment After Final filed March 6, 2008, claim 15 was amended. Thus, the pending, rejected and appealed claims are claims 1, 4-13, 15-19 and 41.

STATUS OF AMENDMENTS

An amendment to claim 15 to correct a syntax error was submitted in the Amendment After Final filed March 6, 2008. The Advisory Action mailed April 10, 2008 indicates that for purposes of Appeal, the proposed amendment is entered.

SUMMARY OF CLAIMED SUBJECT MATTER

1. Introduction

The present invention relates to creating and merging labels for modules and controls in a business solution software program.

2. Brief Background

Business solution software programs provide an end user, typically a corporation, with a customizable, scalable and global enterprise resource planning solution that supports connectivity with the user's various business partners. Many business solution software programs provide the ability to expand the basic functionality of the software beyond the original product to further meet the needs of the implementing corporation. This new or additional functionality is provided through additional modules that are written to take advantage of the existing features and existing data contained within the business solution software. Often these additional modules automatically synchronize the software and the existing data with both the old and new functionalities of the business solution software.

Some business solution software products provide the ability to conduct business in different countries, across multiple languages and in multiple currencies. Through the use of multi-language capabilities provided in business solution software it is possible to transmit documents, such as invoices, in the recipient's preferred language. However, changing the language of the documents in current systems requires loading the new language into the business solution software, and changing the entire operating language of the system.

Communication in different available languages of the business solution software is handled through the use of a plurality of labels. Labels are text that appear on a user interface component such as a computer display monitor. Labels can be used on menus, buttons, dialog boxes, for example. The labels in current business solution software are stored in separate resource files with one resource file dedicated to each language used by the business solution software. Further, each module in the business solution software has its own resource file that is

not shared with other modules.

Throughout the development of business solution software there has been a strong desire among developers to reuse existing labels. However, it has been observed that it is not as advantageous to reuse existing labels in many cases because, for example, various properties associated with a term of the label can change between different uses or the meaning of a label can vary between different developers. This can create problems when a term is changed. For example, the same label text can be used on a menu in one application and on a button in another, thus resulting in different properties for each label.

As mentioned above, typically, in business solution software modules the labels are kept in resource files. However, current business solution software does not use the generic resource files that are available through database metadata stores, such as structured query language (SQL) tables or through web services. Typically these labels, in the business solution software, are module specific, and are stored in proprietary resource files with one resource file dedicated to each language present in the module. One problem associated with using proprietary resource files is that when a developer desires to replace or edit a portion of the labels in one module with new information or properties contained in another resource file, the development system does not look for another label in other modules of the business solution software having the same label properties and/or terminology as the desired label. Further, using resource files makes the management of labels extremely difficult due to the large number of labels present in the software solution. Moreover, the business solution software handles a number of different solutions that are developed by multiple vendors. Often, the developers of these modules develop labels that overlap with labels developed for other modules in the business solution software. The costs in time and resources associated with developing labels, and translating (when multi-language support is desired) the labels is high, especially when a label and its translations already exist elsewhere in the business solution software.

3. The Present Invention

Independent claims 1 and 41 are involved in this appeal. Claim 1 recites a “computer-implemented method of creating a new label in a computer-implemented business integration system, wherein the new label is a computer-implemented user interface element configured to identify a control within a user interface associated with the business integration system.” (Page 15, line 14-page 16, line 13). The claimed method includes a step of “receiving data at an interface indicating a desired text for the new label.” (Page 16, lines 1-7; page 30, lines 12-14). Another step includes “searching a label database for indications of existing labels that include text matching the desired text.” (Page 31, lines 17-19). “[E]xisting labels represented in the label database are computer-implemented user interface elements.” (Page 16, lines 5-7). The method includes “returning to a user, based at least in part on the results of the search of the label database, a list of existing labels that include text matching the desired text.” (Page 31, lines 22-26).

Independent claim 41 recites “A computer-implemented method of creating a new label in a computer-implemented business integration system, wherein the new label is a computer-implemented user interface element configured to identify a control within a user interface associated with the business integration system.” (Page 15, line 14-page 16, line 13). The method includes “receiving data at an interface indicating how the new label is to be used.” (Page 30, lines 22-24). Another step includes “searching a label database for indications of existing labels, wherein searching comprises searching based at least in part on the data indicating how the new label is to be used.” (Page 30, lines 24-26). “[E]xisting labels represented in the label database are computer-implemented user interface elements configured to identify a control within the business solution software system.” (Page 16, lines 5-7). The method includes “returning to a user, based at least in part on the results of the search of the label database, a list of existing labels.” (Page 31, lines 22-26).

GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The first ground of rejection to be reviewed is whether claims 1, 4, 9-10 and 41 are anticipated under 35 U.S. C. §102(e) by Sugimoto et al., US Patent No. 6,678,866.

The second ground of rejection to be reviewed is whether claims 5-8, 11-13 and 15-19 are rendered obvious under 35 U.S.C. §103(a) by the combination of Sugimoto et al., and Van Den Avond et al., US Patent Application No. 2003/0004946.

Appellant respectfully submits that claims 1, 4-13, 15-19 and 41 are patentable over these references and requests that the Board find likewise and accordingly reverse the rejection of these claims and find them allowable.

ARGUMENT

1. Introduction: Claims 1, 4-13, 15-19 and 41 Should Be Allowed

With this Appeal, Appellant respectfully requests that the Board reverse the rejection of claims 1, 4, 9-10 and 41 under 35 U.S.C. §102(e) based on Sugimoto. Further, Appellant respectfully requests that the Board reverse the rejection of claims 5-8, 11-13 and 15-19 under 35 U.S.C. §103(a), based on the combination of Sugimoto and VanDenAvond.

2. Anticipation

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

3. Obviousness

To determine whether a claim is obvious, the scope and contents of the prior art at the time the invention was made must first be determined. *Graham v. John Deere*, 148 USPQ 459 (S.Ct. 1966). Only references from analogous arts may be considered to evaluate obviousness. *In re Oetiker*, 24 USPQ2d 1443 (Fed. Cir. 1992). Analogous references are from the same field as the invention, or are reasonably pertinent to the particular problem to be solved, or are those that would have logically commended themselves to the inventor’s attention in considering the problem to be solved. *In re Oetiker*; *In re Clay*, 24 USPQ2d 1443 (Fed. Cir. 1992).

Once the prior art is properly defined, the differences between the claimed invention as a whole and the prior art as a whole are evaluated. *Graham v. John Deere*; *Hodosh v. Block Drug Co., Inc.*, 229 USPQ 182 (Fed. Cir. 1986)(Rich, C.J.). This first requires construing the claims, according to the broadest reasonable meaning that the claim language would have to a person of ordinary skill in the art at the time the invention was made. *Phillips v. AWH Corp.*, 75 USPQ2d 1321 (Fed. Cir. 2005)(en banc)(Mayer, J. and Newman, J., dissenting).

The test is not whether the individual differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious or not. *Stratoflex, Inc. v. Aeroquip Corp.*, 218 USPQ 871 (Fed. Cir. 1983).

The Supreme Court has recently provided abundant guidance with respect to rejections based upon a combination of references under 35 U.S.C. §103. While the case is considered to be largely be a rejection of the rigid application of the teaching-suggestion-motivation requirement for obviousness, it does reiterate that the analytical framework for the rejection should be made explicit. Moreover, “Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.” *KSR Int'l Co. v. Teleflex Inc.*, 82 USPQ 2d 1385, 1396 (2007) (citing *In re Kahn*, 78 USPQ 2d 1329 (CAFC 2006).

4. Claims 1, 4, 9-10 and 41 are patentable, as they are not anticipated by the prior art

On page 2 of the Final Office Action of December 10, 2007, the Examiner rejected claims 1, 4, 9-10 and 41 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,678,866 issued to Sugimoto et al. (hereinafter “Sugimoto”). However, the Appellant respectfully submits that claim 1 as previously presented is not anticipated by Sugimoto. Claim 1 recites the limitations of “receiving data at an interface indicating a desired text for the new label; searching a label database for indications of existing labels that include text matching the desired text, wherein existing labels represented in the label database are computer-implemented user interface elements; and returning to a user, based at least in part on the results of the search of the label database, a list of existing labels that include text matching the desired text”. (emphasis added). As explained in the original specification, labels are text represented by an identifier. (Page 16, lines 1-2). The labels can be used on modules or any objects including dialog boxes, text strings, and controls, for example. (Page 16, lines 1-11).

While the Appellant's method is directed to creating a new label, "wherein the new label is a computer-implemented user interface element configured to identify a control within a user interface," the label having text, Sugimoto's label is an image: "By "label" is meant a display area on a computer display screen for displaying information. This term refers to an image that simulates an actual label or paper tag that can be displayed on to the desktop as though a piece of paper (tag) were affixed there." (column 2, lines 49-54; emphasis added). Thus, Sugimoto discloses neither a label as "an element configured to identify a control" nor a label comprising text, as claimed.

The last paragraph on page 14 of the Examiner's Answer of September 3, 2008 alleges that Sugimoto teaches "a text string that is entered via an interface of keyboard and this text string or a desired text is used to search for matching and from which creates a new label." While the Appellant agrees that the cited passages do teach that a computing environment may include an input device, there is no teaching that text input is used for searching, matching, or creating a new label, as alleged in the Examiner's Answer. Rather, teachings regarding the use of input device 210 are directed to using a mouse device to move a cursor and select an icon by clicking. (col. 15, lines 10-20). Thus, the Examiner's Answer incorrectly characterizes the input of Sugimoto as text.

Moreover, independent claim 1 recites a limitation of searching "for indications of existing labels that include text matching the desired text." (Page 31, lines 17-19). In contrast, the passage relied on by the Examiner to teach this limitation discloses a comparison of a sponsor identifier contained in the label information against the sponsor identifier stored in a registry (column 16, lines 21-28). There is no teaching in Sugimoto that such identifier information is text; such information could be in numerical or bar code form, for example. Thus, the text matching limitation of claim 1 is not disclosed by Sugimoto. Thus, independent claim 1 and its dependent claims 4 and 9-10 are not anticipated by Sugimoto.

Moreover, at least some of the dependent claims separately recite additional limitations that are not taught by Sugimoto. For example, claim 10 recites the limitations of "receiving data at the interface indicating how the new label is to be used." (Page 30, lines 22-24). There is no

disclosure that Sugimoto's method receives any indication of how a new label is to be used, as recited in claim 10. The passage cited by the Examiner merely teaches that a computing environment may include an input device, without teaching any indication of how a new label is to be used. (column 9, lines 30-45).

In the Advisory Action mailed April 10, 2008, the Examiner pointed out additional passages of Sugimoto to support his contention that Sugimoto teaches the limitation of "receiving data at the interface indicating how the new label is to be used." However, these additional passages also fail to teach the recited limitations. Sugimoto's delivery system includes "a notification information database for storing notification information, a label information database for storing label information, and a server for controlling communications between these databases and the notification information display apparatuses." (Column 6, lines 17-21). The server can transmit notification information and/or label information with specified timing to a display apparatus. (Column 6, lines 22-27). Sugimoto teaches that "[i]t is preferable that the delivery system primarily perform transmissions of notification information, but it may also append label information at the same time if necessary." (Column 6, lines 27-30). Thus, it is apparent that Sugimoto's notification information and label information are completely separate. The notification information includes address information that indicates network addresses related to a given notification. (Column 3, lines 16-18). The label information includes, for example, label image data for the front and back sides of the label (column 3, lines 28-31). There is no teaching of data indicating how a new label is to be used, as claimed.

Independent claim 41 recites that a label "is a computer-implemented user interface element configured to identify a control within a user interface associated with the business integration system." As discussed earlier, Sugimoto's labels are images, such as those to convey advertising information. Therefore, they do not meet the definition of a label as set forth in independent claim 41 for an element to identify a control. Moreover, claim 41 recites "receiving data at an interface indicating how the new label is to be used." As discussed above with respect to claim 10, Sugimoto does not teach this limitation.

Because Sugimoto does not teach each element of claim 1, 4, 9-10 or 41, it does not

anticipate these claims. Withdrawal of the rejection of these claims under 35 U.S.C. §102(e) is respectfully requested.

5. Claims 5-8, 11-13 and 15-19 are patentable, as they are not obvious in view of the prior art

On page 5 of the Office Action, the Examiner rejected claims 5-8 and 11-19 under 35 U.S.C. §103(a) as being unpatentable over Sugimoto in view of U.S. Publication No. 2003/0004946 A1 of VanDenAvond et al. (hereinafter “VanDenAvond”). The Appellant respectfully points out that claim 14 was cancelled in the Amendment filed September 7, 2007 and refiled October 2, 2007. Each of claims 5-8, 11-13 and 15-19 depends from independent claim 1. Claim 1 defines a label as “a computer-implemented user interface element configured to identify a control wherein a user interface associated with the business integration system.”

In sharp contrast, VanDenAvond’s label is a packaging label, such as a printed material for affixing onto a container. (paragraphs 2 and 3). For example, VanDenAvond’s labels are stickers that are applied to boxes to enable people to identify the contents of the boxes or enable people to identify the intended shipping destinations of the boxes. VanDenAvond’s labels are clearly not computer-implemented user interface elements configured to identify control within a user interface, as recited in claim 1. The physical sticker disclosures of VanDenAvond are in a completely unrelated field compared to the claimed labels. A person of ordinary skill in the art would therefore not look to VanDenAvond to modify the teachings of Sugimoto. Therefore, the combination of VanDenAvond and Sugimoto is not a proper one on which to base an obviousness rejection. Moreover, even when VanDenAvond and Sugimoto are combined, they do not render obvious each claimed limitation. For example, the label of Sugimoto refers to an image used in advertising. The label in VanDenAvond refers to a sticker applied to a container. Even in combination, these references do not render obvious a recitation of a label as “a computer-implemented user interface element configured to identify a control within a user interface associated with the business integration system,” as claimed. Therefore, independent claim 1 and its dependent claims 5-8, 11-13 and 15-19 are not rendered obvious by the

combination of Sugimoto and VanDenAvond.

Moreover, at least some of the dependent claims individually recite additional limitations that are not rendered obvious by the combination of the references. For example, claim 18 recites “associating an ID of the selected label with the new label.” This is taught by Applicants’ specification at, for example, page 7, lines 11-28:

“When the selected label is duplicated to the new label, a GUID is generated for the new label, and an entry in the new label’s record is generated indicating the GUID of the label that was duplicated to this label. This entry is provided to allow the text of the new label to be updated when the parent label’s text is changed. Further, when a label is duplicated to the new label any associated translations are copied to the label text table for the new label. This allows for the full language capability of the business solution software system to carry over to the new label without incurring any additional costs associated with translating the new label into the available languages. In another embodiment, when a translated version of the label is updated, all related labels sharing the same master label are updated with the new version of the translated label.”

No such association of identifying information between a selected label and a new label is taught by either Sugimoto or VanDenAvond, alone or in combination. The passages of VanDenAvond relied upon by the Examiner teach that while existing label ID’s are searched, a new ID is associated with a new label. In contrast, claim 18 recites that an existing ID of a selected label is associated with a new label. In view of the foregoing, the Appellant respectfully requests withdrawal of the rejection of the claims 5-8, 11-13 and 15-19 under 35 U.S.C. §103(a).

In the Advisory Action of April 10, 2008, the Examiner states that “applicants are interpreting the claims very narrow without considering the broad teaching of the references used in the rejections.” Appellant respectfully submits that the broad teachings of the references do not render obvious each of the recited limitations in the claims, particularly those limitations set forth in these arguments.

Moreover, the Examiner wrote that “the examiner explicitly stated passages in the cited references which were not even addressed.” However, Appellant respectfully submits that Appellant is not required to rebut each statement advanced by the Examiner. Rather, Appellant is required only to show that the Examiner’s arguments fail with respect to any claim limitation.

The statute specifically states that "[a] person shall be entitled to a patent unless" one of the enumerated conditions is met. 35 USC sec. 102/103. Thus, the burden is on the Examiner to set forth a *prima facie* case of anticipation or obviousness with respect to each claim limitation; if the Examiner does not meet this burden, then the claimed subject matter is patentable.

Additionally, the Examiner states that the Applicant has made general assertions that the limitations are not taught but have not supported these allegations with objective factual evidence. Appellant respectfully disagrees with this statement. Appellant has set forth in detail the limitations of the claims that have not been taught or rendered obvious by the prior art of record. Appellant has explained in detail where the references are lacking in their teachings and where the rationale underlying the rejections is faulty.

6. Conclusion

With this response, Appellant submits an earnest effort to address all issues raised in the Final Office Action of December 10, 2007, the Advisory Action of April 10, 2008, and the Examiner's Answer of September 3, 2008.

Appellant respectfully submits that, as described above, the cited prior art does not teach or make obvious the combination of features recited in the claims, either alone or in combination. Appellant asserts that it is the combination of elements recited in the claim, when the claims are interpreted as a whole, which is patentable. Appellant has emphasized certain features in the claims as clearly not present in the cited references, as discussed above. However, Appellant does not concede that other features in the claims are found in the prior art. Rather, for the sake of simplicity, Appellant is providing examples of why the claims described above are distinguishable over the cited prior art.

Appellant wishes to clarify for the record, if necessary, that the claims have been amended to expedite prosecution. Moreover, Appellant reserves the right to pursue the subject matter recited in the original or prior claims in a continuation application.

To the extent any amendments made to the claims might be considered to be narrowing amendments, such revisions in the present Amendment are not to be construed as a

surrender of any subject matter between the original claims and the present claims. Again, to the extent revisions to the claims have been made, they are merely Appellant's best attempt at providing a definition of what Appellant believes to be suitable patent protection. In addition, the present claim provides the intended scope of protection that Appellant is seeking for this application. Therefore, no estoppel should be presumed, and Appellant's claims are intended to include a scope of protection under the Doctrine of Equivalents.

Further, Appellant hereby retracts any arguments and/or statements made during prosecution that were rejected by the Examiner during prosecution and/or that were unnecessary to obtain allowance, and only maintain the arguments that persuaded the Examiner with respect to the allowability of the present claims, as one of ordinary skill would understand from a review of the prosecution history. That is, Appellant specifically retracts statements that one of ordinary skill would recognize from reading the file history were not necessary, not used and/or were rejected by the Examiner in allowing the patent application.

For all the reasons advanced above, Appellant respectfully submits claims 1, 4-13, 15-19 and 41 of this application is in condition for allowance, and that such action is earnestly solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: /Mai-Tram D. Lauer/
Mai-Tram D. Lauer, Reg. No. 43,589
Suite 1400, 900 Second Avenue South
Minneapolis, Minnesota 55402-3244
Phone:(612) 334-3222 Fax:(612) 334-3312

MDL:slg

Claims Appendix

Claims on appeal, as they currently stand:

1. (Previously Presented) A computer-implemented method of creating a new label in a computer-implemented business integration system, wherein the new label is a computer-implemented user interface element configured to identify a control within a user interface associated with the business integration system, the method comprising:
 - receiving data at an interface indicating a desired text for the new label;
 - searching a label database for indications of existing labels that include text matching the desired text, wherein existing labels represented in the label database are computer-implemented user interface elements; and
 - returning to a user, based at least in part on the results of the search of the label database, a list of existing labels that include text matching the desired text.
2. (Cancelled)
3. (Cancelled)
4. (Previously Presented) The method of claim 1 further comprising:
 - creating a new entry in the label database for the new label.
5. (Previously Presented) The method of claim 4 wherein creating a the new entry comprises:
 - assigning a GUID for the new label; and
 - creating a record in a label text database for text associated with the new label.
6. (Previously Presented) The method of claim 5 further comprising:
 - receiving data at the interface indicating a category code for the new label; and

receiving data at the interface indicating a description for the new label.

7. (Previously Presented) The method of claim 6 wherein receiving data at the interface indicating a description includes receiving a namespace.

8. (Previously Presented) The method of claim 6 further comprising:
receiving data at the interface indicating an original language for the new label.

9. (Previously Presented) The method of claim 4 further comprising:
storing the new label in the label database.

10. (Previously Presented) The method of claim 1 further comprising:
receiving data at the interface indicating how the new label is to be used.

11. (Previously Presented) The method of claim 10 wherein searching the label database for existing labels that include text matching the desired text comprises:
selecting records in the label database having at least a portion of the desired text;
identifying in the selected records an indication of how the selected record is used;
comparing the indicated use of the selected records with the indicated use of the new label; and
ordering the selected records based on a the degree of match relative to the desired text and indicated use of the new label.

12. (Previously Presented) The method of claim 11 wherein returning to the user the list of existing labels comprises:
displaying the list of existing labels.

13. (Previously Presented) The method of claim 12 wherein displaying the list comprises:

displaying the list of existing labels where the existing labels having a closest match to the desired text are displayed first.

14. (Cancelled)
15. (Currently Amended) The method of claim 11 further comprising:
receiving a selection of a label from the list of existing labels; and
comparing the indicated use of the selected label against the indicated use of the new label.
16. (Previously Presented) The method of claim 15 comprising:
determining that the indicated use of the selected label is not the same as the indicated use of the new label; and
duplicating the selected label to the new label in the label database.
17. (Previously Presented) The method of claim 16 further comprising:
duplicating to the record in the label text database for the new label any translations in the label text database for the selected label.
18. (Previously Presented) The method of claim 16 further comprising:
associating an ID of the selected label with the new label.
19. (Previously Presented) The method of claim 15 comprising:
determining that the indicated use of the selected label is the same as the indicated use of the new label; and
using the selected label for the new label.
20. (Cancelled)

21. (Withdrawn) A data structure representing a label comprising:
 - a label identification (ID); and
 - a label text including text in a plurality of languages.
22. (Withdrawn) The data structure of claim 21 wherein the label ID comprises:
 - a unique ID;
 - a namespace; and
 - a category.
23. (Withdrawn) The data structure of claim 22 wherein the label ID further comprises:
 - a description field indicating how the label is used.
24. (Withdrawn) The data structure of claim 23 wherein the label ID further comprises an indication that the label is a duplicate of another label stored in a duplicated from field.
25. (Withdrawn) The data structure of claim 24 wherein the duplicated from field includes the unique ID for the label that the current label was duplicated from.
26. (Withdrawn) The data structure of claim 22 wherein the category further comprises:
 - a node type;
 - an object type; and
 - a property name.
27. (Withdrawn) The data structure of claim 22 wherein the unique ID is a GUID.
28. (Withdrawn) The data structure of claim 22 wherein the label ID includes a field indicating that the label is a master label.

29. (Withdrawn) The data structure of claim 21 wherein the label text comprises:
 - a textual phrase entry in an original language; and
 - a translation of the textual phrase into at least one of the plurality of languages.
30. (Withdrawn) The data structure of claim 29 wherein the label text further comprises:
 - an edited date field for each entry in the label text indicating at least the date that entry was created.
31. (Withdrawn) The data structure of claim 30 wherein the label text further comprises:
 - a field holding a unique ID for each entry in the label text;
 - a field holding an ID of a label in the label ID table that is for the master label; and
 - a history field indicating information related to a history of the label text.
32. (Withdrawn) The data structure of claim 21 wherein the label ID and the label text are a single metadata table.
33. (Withdrawn) The data structure of claim 21 further comprising:
 - a master indication, indicating that a label has a master label; and
 - a language indication indicating a selected language that the label was created in.
34. (Withdrawn) A computer readable medium containing computer executable instructions that, when executed, cause a computer to perform the steps of:
 - creating a new object in the label database for the new label;
 - receiving data into an interface an indication how the new label is used;
 - searching a label database for text matching the desired text; and
 - returning to the user a list of matches found in the label database.
 - selecting one of the matches as a text of the new label.

35. (Withdrawn) The computer readable medium of claim 34 further comprising instructions to perform the steps of:

- assigning a GUID for the new label;
- creating a record in a label text database for the new label;
- receiving a category code for the new label;
- receiving a description for the new label;
- receiving an indication of an original language in which the new label is written; and
- storing versions of the text for the new label in a record in a label text database.

36. (Withdrawn) The computer readable medium of claim 35 further comprising instructions to perform the steps of:

- opening a label dialog interface prior to receiving data into the interface; and
- receiving the data in the label dialog interface.

37. (Withdrawn) The computer readable medium of claim 34 wherein searching the label database for text matching the desired text further comprising instructions to perform the steps of:

- selecting records in the label database having at least a portion of the desired text;
- identifying in the selected records an indication of how the selected record is used;
- comparing the indicated use of the selected records with the indicated use of the new label;
- ordering the selected records based on a match with the desired text and indicated use of the new label;
- displaying the list of matches on the user interface;
- displaying information for each identified entry contained in the label database;
- receiving an indication that one record in the list of matches is a desired entry;
- selecting that entry as the new label; and

comparing the category of the selected label against the category of the new label.

38. (Withdrawn) The computer readable medium of claim 50 wherein if the category of the selected label is not the same as the category of the new label then further comprising instructions to perform the steps of:

duplicating the selected label to the new label in the label database; and
creating an entry in the new label indicating the ID of the selected label.

39. (Withdrawn) The computer readable medium of claim 38 further comprising instructions to perform the steps of:

duplicating any translations in the label text database to the record in the label text database for the new label.

40. (Withdrawn) The computer readable medium of claim 39 wherein if the none of the selected records includes the desired text then further comprising instructions to perform the steps of:

receiving an entire portion of the desired text into the new label; and
assigning a category and a namespace control based upon a current category and namespace control.

41. (Previously Presented) A computer-implemented method of creating a new label in a computer-implemented business integration system, wherein the new label is a computer-implemented user interface element configured to identify a control within a user interface associated with the business integration system, the method comprising:

receiving data at an interface indicating how the new label is to be used;
searching a label database for indications of existing labels, wherein searching comprises
searching based at least in part on the data indicating how the new label is to be used, and wherein the existing labels represented in the label database are computer-implemented user interface elements configured to identify a control

within the business solution software system; and
returning to a user, based at least in part on the results of the search of the label database,
a list of existing labels.

Evidence Appendix

None.

Related Proceedings Appendix

None.